



280195

DATE: AUGUST 26, 1993

FROM: PETER GURIA, OSC REGION V, RS1, GROSSE ILE, MI

TO:

D.DIETRICH/ATTN: T.JOHNSON, USEPA, OSWER, WASH.D.C.....(VIA FAX)
R.KARL, CHIEF, EERB, CHICAGO, IL.....(E-MAIL)
R.POWERS, EERB, CHIEF RS-1, (MI-OH), GROSSE ILE, MI.....(E-MAIL)
M.McCUE/ATTN: L.LEVEQUE, OFF. PUB. AFF.CHICAGO, IL.....(VIA FAX)
T.KRUEGER-ATTN: T.BRANIGAN, ORC, CHICAGO, IL.....(VIA FAX)
L.BEASELY, EERB, ESS, CHICAGO, IL.....(VIA FAX)
M.ADELMAN MDNR ERD, P.O.BOX 30028, LANSING, MI 48909....(US MAIL)
M.VANDERLAAN, MDNR, 38980 SEVEN MILE RD, LIVONIA, MI 48152.(US MAIL)
J.REARDON, DETROIT FIRE DEPT.....(US MAIL)
P.MAX, DETROIT DEPT. COMM.& IND. HYGIENE, CITY OF DET...(VIA FAX)

SUBJECT: ~~ENTERPRISE OIL REMOVAL ACTION-PHASE II~~, DETROIT, MI
POLREF NO.: ~~POLREF I~~ - PHASE II SITE ID: PG D.O.: 5001-05-319
RESPONSE AUTHORITY: CERCLA NPL STATUS: NO
LATITUDE: 42°33'47" LONGITUDE: 83°07'28"
START DATE: 06/16/93
COMPLETION DATE:

1. SITUATION:

- A. SITE HAS REMAINED SECURE SINCE COMPLETION OF PHASE I REMOVAL ACTION ON 12/4/92.
- B. OSC ISSUED DELIVERY ORDER TO NEW ERCS CONTRACTOR, RIEDEL ENVIRONMENTAL SERVICES, INC. (RES) TO BEGIN TREATABILITY STUDY IN PREPARATION OF PHASE II REMOVAL ACTION - BIOREMEDIATION.
- C. RES INITIATED A TREATABILITY STUDY IN APRIL 1993. RESULTS OF THE STUDY WERE RECEIVED IN AUGUST 1993 AND ARE CURRENTLY UNDER REVIEW BY THE OSC.

2. ACTIONS TAKEN:

- A. MOBED RES OPERATOR AND PROJECT MANAGER TO SITE TO CONDUCT SAMPLING ACTIVITIES FOR TREATABILITY STUDY 4/22/93. RES DETERMINED SAMPLING POINTS FROM ANALYTICAL RESULTS RECEIVED FROM EOC STUDY IN AUGUST 1992.
- B. A TOTAL OF 30 GALLONS OF SOIL COLLECTED FROM SEVEN SEPARATE LOCATIONS AT VARIOUS DEPTHS AND SUBMITTED TO POLYBAC, INC. FOR A BIOREMEDIATION TREATABILITY STUDY. RES CREW DEMOED 4/22/93 PM.
- C. TREATABILITY STUDY RESULTS RECEIVED 8/6/93. RESULTS REVEALED A REDUCTION IN TOTAL PETROLEUM HYDROCARBONS (TPH) OF BETWEEN 63 AND 78 PERCENT AFTER THE 43 DAY STUDY. HOWEVER, ALL SAMPLES EXCEEDED THE 100 PPM CLEANUP CRITERIA FOR TPH UPON COMPLETION OF THE STUDY.
- D. RES SUBMITTED A WORKPLAN TO THE U.S EPA FOR BIOREMEDIATION OF THE ON-SITE SOILS IN JUNE 1993. THE PLAN WAS LATER REVISED IN JULY 1993 AND IS UNDER REVIEW.
- E. MOBED RES CREW 8/16/93 TO PREP SITE FOR BIOREMEDIATION ACTIVITIES. PC150 TRACKHOE MOBED TO SITE 8/16/93. CREW BEGAN REMOVAL OF CONCRETE WALL SURROUNDING MAIN CONTAINMENT AREA. BERM WAS CONSTRUCTED UTILIZING ON-SITE SOIL INSIDE CONTAINMENT STRUCTURE PRIOR TO REMOVAL OF

CONCRETE. SOIL BERM WAS COVERED WITH VISQUEEN, AND SECURED WITH SAND BAGS.

- F. REMOVAL OF CONCRETE CONTAINMENT WALL CONTINUED 8/17/93 AND WAS COMPLETED 8/19/93. PC220 TRACKHOE WITH BREAKER MOBED TO SITE. CREW BEGAN CRUSHING CONCRETE AND STAGED FOR DISPOSAL. A TOTAL OF 15 LOADS, EQUALING APPROXIMATELY 400 TONS OF CONCRETE SHIPPED TO FOR RECYCLING 8/20 - 8/21/93. ALL VISIBLE REBAR WAS REMOVED FROM CONCRETE PRIOR TO SHIPPING.
- G. STANDING OIL/SLUDGE WAS OBSERVED IN THE CENTER CONTAINMENT AREA WHILE CONDUCTING CONCRETE REMOVAL ACTIVITIES 8/17/93. CREW DEWATERED CONTAINMENT AREA TO PROVIDE ACCESS TO VISIBLE CONTAMINATION. APPROXIMATELY 12 TONS OF KILN DUST WAS UTILIZED TO PARTIALLY SOLIDIFY OIL/SLUDGE FOR EASIER HANDLING 8/20/93. MATERIAL WAS LOADED INTO FOUR - 20 YD³ ROLLOFF BOXES, PROCURED FROM YOUNG ENVIRONMENTAL, INC. 8/23/93. ROLLOFFS STAGED ON SITE PENDING DISPOSAL PROCUREMENT. ONE COMPOSITE SAMPLE WAS COLLECTED BY THE TAT AND SUBMITTED TO AN OFF-SITE LAB TO BE ANALYZED FOR LANDFILL PARAMETERS.

3. PLANS:

- A. OSC TO THOROUGHLY REVIEW TREATABILITY STUDY REPORT AND RES WORKPLAN FOR BIOREMEDIATION, AND DETERMINE ITS FEASIBILITY.
- B. UPON REVIEW OF ANALYTICAL RESULTS, THE APPROXIMATELY 80 YD³ OF SOIL WILL BE PROFILED FOR DISPOSAL.
- C. INITIATE BIOREMEDIATION OF ON-SITE CONTAMINATED SOIL IN THE SPRING OF 1994.

4. KEY ISSUES:

- A. BUDGET RE-PRIORITIZATION BY EERB FOR THIS FISCAL YEAR HAS DELAYED THE IMPLEMENTATION OF ACTUAL BIOREMEDIATION ACTIVITIES AT THE SITE. IN ADDITION, RES FAILED TO PROCURE AND PROVIDE TREATABILITY STUDY RESULTS IN AN EXPEDITIOUS MANNER. TREATABILITY RESULTS PROVIDED BY POLYBAC INC. WERE INCONCLUSIVE FOR CONTAMINANTS OF CONCERN. RIEDEL'S ESTIMATE OF CONTAMINATED SOIL TO UNDERGO BIOREMEDIATION WAS BIASED LOW, WHILE COST ESTIMATES WERE ELEVATED. OSC CURRENTLY EVALUATING RES CAPABILITY TO COMPLETE THE SCOPE OF WORK.
- B. UNANTICIPATED DISPOSAL COSTS WILL BE INCURRED DUE TO THE VISIBLE OIL/SLUDGE REMOVED FROM THE CENTRAL CONTAINMENT AREA. THE MATERIAL WILL BE DISPOSED OF OFF-SITE SINCE BIOREMEDIATION WILL NOT BE INITIATED UNTIL 1994, AND THERE WAS A POTENTIAL FOR OFF-SITE MIGRATION.
- C. OSC SUBMITTED A DRAFT ACTION MEMO REQUESTING A TWELVE MONTH EXEMPTION AND CEILING INCREASE. THE DRAFT ACTION MEMO IS CURRENTLY UNDER REVIEW.

5. ESTIMATED COSTS:

	<u>BUDGETED</u>	<u>TOTAL TO DATE</u>	<u>REMAINING</u>
ERCS	\$1,200,000.00	* \$ 992,129.77	\$ 207,870.23
TAT	\$ 342,000.00	**\$ 129,561.00	\$ 212,439.00
EPA	\$ 163,400.00	***\$ 25,970.00	\$ 137,430.00
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TOTAL:	\$1,705,400.00	\$1,147,660.77	\$ 52,339.23

- * ERCS COSTS INCLUDE PHASE I COSTS INCURRED BY I.T. CORP. UNDER D.O.#: 7640-05-232 TOTALING \$964,000.00 AND PHASE II CCSTS INCURRED BY RES TAKEN FROM 1900-55 DATED 8/17/93 TCTAL TO DATE \$28,129.77.
- ** INCLUDES COSTS INCURRED THROUGH 08/14/93 AS STATED FROM THE TAT REGIONAL RORIS PRINTOUT, AND ITEMIZED COSTS FROM ON-SITE ACTIVITIES FROM 8/1693 - 8/24/93. TAT COSTS INCLUDES MULTIPLIER COSTS.
- *** INCLUDES COST INCURRED THROUGH 1/9/93.